

WINSTON LEE
ATTORNEY AT LAW
20 VESEY STREET ~ SUITE 400
NEW YORK, NEW YORK 10007

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**Tel. (212)267-1911
Fax. (212)964-2926**

August 12, 2014

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Filed ECF

Re: United States vs. Rasheem Riley, et al.
14 Cr. 498 (WHP)

Dear Judge Pauley:

I write as counsel for Mr. Rasheem Riley, a defendant in the above-referenced case.

This letter is respectfully submitted, in advance of Mr. Riley's detention hearing on August 18, 2014, at 11:30 A.M., to provide the Court with information about the bail package being proffered by defendant, and about other matters relevant to the issue of bail.

I. Background

On July 30, 2014, upon his presentment before Magistrate Judge Debra Freeman, Mr. Riley pleaded not guilty to the above referenced indictment in which he is charged in Count One with the crime of conspiracy to distribute and possess with intent to distribute and possess with intent to distribute 280 grams and more of crack cocaine. Mr. Riley is not charged in the additional three counts of the indictment alleging firearms offenses or Hobbs Act robbery.

Mr. Riley consented to an order of detention without prejudice to his making a future bail application.

Mr. Riley is a lifelong resident of New York and has significant ties to New York. As set forth below, seven people have unequivocally come forward and offered to act as sureties for Mr. Riley, each confident that he will abide by any terms and conditions imposed by this Court should he be released on bond.

II. Proposed Bail Package

It is respectfully requested that Your Honor release Mr. Riley on a substantial and restrictive bond secured by the assets and assurances of the following seven financially responsible persons and including, at a minimum, the restrictive conditions described below.

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Co-signers Of The Bond

Mr. Riley proffers the following seven financially responsible co-signers of the bond. Each of the co-signers is a very close friend or relative of Mr. Riley, who is gainfully employed. Their combined annual income is over \$250,000.00 dollars, and each one is a United States Citizen:

1. Name: Mr. Cecil Pressley (brother in law of the defendant)
 Residence: New York
 Employer: Trade Off Construction Company, New York
 Job Title: Construction Worker, Full Time
 Years at Company: 10 years
 Annual Salary: Approximately \$35,000/year
2. Name: Ms. Lovely O'Neal (girl friend of defendant)
 Residence: New York
 Employer: Western Beef Company, New York
 Job Title: Clerk, Bakery Department, Full Time
 Years at Company: 2 years
 Annual Salary: Approximately \$20,000/year
3. Name: Mr. Andrew Santana (friend of defendant)
 Residence: New York
 Employer: Empire Merchants Company, New York
 Job Title: Truck Driver
 Years at Company: 2 years
 Annual Salary: Approximately \$60,000/year
4. Name: Mr. Jason Santana (friend of the defendant)
 Residence: New York
 Employer: U.S. Postal Service
 Job Title: Letter Carrier
 Years at Company: 9 years
 Annual Salary: Approximately \$56,000/year
5. Name: Ms. Annette Ingram (friend of the defendant)
 Residence: New York
 Employer: Citifield (Shea Stadium)
 Job Title: Maintenance/Housekeeping Staff
 Years at Company: 25 years
 Annual Salary: Approximately \$27,000/year

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6. Name: Ms. Keisha O'Neal (friend of the defendant)
 Residence: New York
 Employer: Fairway Market, New York
 Job Title: Baker
 Years at Company: 2 years
 Annual Salary: Approximately \$19,500/year

7. Name: Lisa Saintcloud (friend of the defendant)
 Residence: New York
 Employer: NYC Human Resources Administration, Social Services Dept.
 Job Title: Job Opportunity Specialist
 Years at Job: One year
 Annual Salary: Approximately \$35,740.00/year

Additional Conditions of Release

Defendant agrees to be subjected to the following conditions/restrictions during his release:

1. Strict Pretrial Services supervision. Mr. Riley also agrees to home detention with an ankle bracelet if the Court decides this is necessary;
2. Drug testing and monitoring (as required by Pretrial Services);
3. Travel restricted to SDNY, EDNY;
4. Surrender any travel documents, and not to apply for any new travel documents;
5. No contact or associating with co-defendants except in the presence of counsel;
6. Any other conditions as the Court deems appropriate and necessary.

III. Conclusion

The substantial and restrictive bail package proposed by defendant more than adequately addresses any concerns regarding risk of flight or danger to the community.

Mr. Riley's family and friends are prepared to come before this Court where they intend to stake their financial futures on the presence of the defendant at each and every court appearance. Each potential surety understands that they will be jointly and severally liable for the entire amount of the bond should Mr. Riley fail to return to court. Mr. Riley, a United States citizen, will appear in court when required to do so, comply with all the restrictive conditions imposed by this Court and cooperate with United States Pre-Trial Services. He understands that his failure to return to court would result in the financial ruin of his family and friends and would result in additional charges being levied against him.

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Accordingly, at the conclusion of the bail hearing on August 18, 2014, Mr. Riley will respectfully request that the Court grant him bail in accordance with bail package outlined above.

Respectfully submitted,

/s/
WINSTON LEE

cc: Andrea Griswold
Assistant U.S. Attorney
(By e-mail)